

Todd Gaddis
May 19, 2023

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHAARILLE LINZY,

Plaintiff,

Civil Case No.: 1:21-cv-05097

-against-

UBER TECHNOLOGIES, INC.,

Defendants.

VIDEO CONFERENCE

DEPOSITION

Date: May 19, 2023

Time: 12:06 p.m.

EXAMINATION BEFORE TRIAL of TODD GADDIS, a
Defendant herein, taken on behalf of the Plaintiff and
held before ANTHONY R. DEPALMA, a Notary Public of the
State of New York.

Todd Gaddis
May 19, 2023

Todd Gaddis
May 19, 2023

1 A P P E A R A N C E S:

2 ROSENBAUM & ROSENBAUM, P.C.
3 Attorneys for Plaintiff
4 100 Wall Street, 15 Floor
New York, New York 10005
(212) 514-5007
5 BY: MATTHEW GAMMONS, ESQ.

6

7 PERKINS COIE LLP
8 Attorneys for Defendant
1155 6th Ave 22nd floor
New York, New York 10036
(212) 262-6900
9 BY: STEVEN WILLIAMSON, ESQ.

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11

12 ALSO PRESENT:

13

Leah Alman, Uber Senior Counsel

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Todd Gaddis
May 19, 2023

Todd Gaddis
May 19, 2023

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2 IT IS HEREBY STIPULATED AND AGREED by and between
3 the attorney for the respective parties herein, and in
4 compliance with Rule 221 of the Uniform Rules for the
5 Trial Courts:

6 THAT the parties recognize the provision of Rule
7 3115 subdivisions (b), (c) and/or (d). All objections
8 made at a deposition shall be noted by the officer before
9 whom the deposition is taken, and the answer shall be
10 given and the deposition shall proceed subject to the
11 objections and to the right of a person to apply for
12 appropriate relief pursuant to Article 31 of the CPLR.

13 THAT every objection raised during a deposition
14 shall be stated succinctly and framed so as not to
15 suggest an answer to the deponent and, at the request of
16 the questioning attorney, shall include a clear
17 statement as to any defect in form or other basis or
18 error in irregularity. Except to the extent permitted by
19 CPLR Rule 3115 or by this rule, during the course of the
20 examination persons in attendance shall not make
21 statements or comments that interfere with the
22 questioning.

23 THAT a deponent shall answer all questions at a
24 deposition, except (i) to preserve a privilege or right
25 of confidentiality, (ii) to enforce a limitation set

Todd Gaddis
May 19, 2023

1 Todd Gaddis
2 May 19, 2023
3 forth in an order of a court, or (iii) when the question
4 is plainly improper and would, if answered, cause
5 significant prejudice to any person. An attorney shall
6 not direct a deponent not to answer except as provided in
7 CPLR Rule 3115 or this subdivision. Any refusal to
8 answer or direction not to answer shall be accompanied by
9 a succinct and clear statement of the basis therefore.
10 If the deponent does not answer a question, the examining
11 party shall have the right to complete the remainder of
12 the deposition.

13 THAT an attorney shall not interrupt the deposition
14 for the purpose of communicating with the deponent unless
15 all parties consent or the communication is made for the
16 purpose of determining whether the question should not be
17 answered on the grounds set forth in section 221.2 of
18 these rules and, in such event, the reason for the
19 communication shall be stated for the record succinctly
20 and clearly

21 THAT failure to object to any question or to move
22 to strike any testimony at the examination shall no be a
23 bar or waiver to make such objection or motion at the
24 time of the trial of this action, and is hereby reserved;
25 and

26 THAT the examination may be signed and sworn to by
27 the witness examined herein before any Notary Public, but

Todd Gaddis
May 19, 2023

1 Todd Gaddis
2 May 19, 2023
3 failure to do so or to return the original of the
4 examination to the attorney on whose behalf the
5 examination if taken shall not be deemed a waiver of the
6 rights provided by Rules 3116 and 3117 of the CPLR, and
7 shall be controlled thereby and

8 THAT certification and filing of the original of
9 the examination are waived; and

10 THAT the questioning attorney shall provide counsel
11 for the witness examined herein with a copy of the
12 examination at no charge.

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Todd Gaddis
May 19, 2023

Todd Gaddis
May 19, 2023
THE COURT REPORTER: The attorneys
participating in this deposition
acknowledge that I am not physically
present in the deposition room and that I
will be reporting this deposition
remotely.

They further acknowledge that, in
lieu of an oath administered in person, I
will administer the oath remotely,
pursuant to Executive Order Number 202.7
issued by Governor Cuomo on March 19,
2020.

The parties and their counsel consent
to this arrangement and waive any
objections to this manner of reporting.

Please indicate your agreement by
stating your name and your agreement on
the record.

MR. GAMMONS: Plaintiff's counsel,
Matthew Gammons. We consent.

MR. WILLIAMSON: This is Steven
Williamson for Uber. I consent.

THE COURT REPORTER: Will the witness
kindly present their government-issued ID
by holding it up to the camera for

Todd Gaddis
May 19, 2023

Todd Gaddis
May 19, 2023

1 verification.

2 (Witness complying)

3 THE COURT REPORTER: I will swear you
4 in.

5 T O D D G A D D I S

6 having first been duly sworn by the Notary Public
7 (Anthony R. DePalma) of the State of New York, was
8 examined and testified as follows:

9 EXAMINATION BY

10 MR. GAMMONS:

11 Q. Please, state and spell your name for the
12 record.

13 A. Todd Gaddis, T-O-D-D G-A-D-D-I-S.

14 Q. Please, state your address for the record.

15 A. Is my business address fine?

16 MR. WILLIAMSON: Business address is
17 fine.

18 A. 1725 3rd Street, San Francisco, California
19 94158.

20 Q. Good afternoon, Mr. Gaddis. My name is
21 Matthew Gammons. I represent the plaintiff in this
22 matter.

23 I'm going to be asking you some questions
24 today. During the course of the deposition, as you
25 obviously know, were on a virtual platform and

Todd Gaddis
May 19, 2023

1 Todd Gaddis
2 May 19, 2023
3 occasionally, hopefully not, we might have audio or
4 visual difficulties. If either of those happen,
5 please don't answer the question.

6 Let's make sure you heard the whole thing.
7 The court reporter will read it back, but please,
8 if there's any, you know, difficulty hearing for
9 any reason at all, you let me know and I'll make
10 sure the question is read back.

11 I don't want you answering a question
12 you're not sure about, okay?

13 A. Okay.

14 Q. Okay. Same thing for if you don't
15 understand the question. If I ask a question
16 that's just not comprehensible to you or for
17 whatever reason you just don't understand it,
18 again, I don't want you to answer a question if you
19 don't understand or don't hear.

20 So, please let me know and I'll rephrase
21 it, explain it or ask a different question, okay?

22 A. Okay.

23 Q. Okay. If and if you need to take a break
24 at any time, just let me know and I'll accommodate
25 you, okay?

 A. Sounds good.

 Q. Have you ever been deposed before?

Todd Gaddis
May 19, 2023

Todd Gaddis
May 19, 2023

1 A. Yes, I have.

2 Q. How many times have you been deposed?

3 A. More than 20. Not sure the exact amount.

4 Q. Okay. Were all of those 20-plus
5 depositions on behalf of Uber?

6 A. Yes, they were.

7 Q. So, what is your current title with Uber?

8 A. I'm a data science manager.

9 Q. And how long have you been a data manager
10 for Uber?

11 A. Probably, around four years.

12 Q. And prior to that, did you have any other
13 position within Uber?

14 A. Yes. Before that I was a data analyst.

15 Q. And for how long were a data analyst for
16 Uber?

17 A. A year and a half maybe. Year and a
18 half/two years.

19 Q. And prior to being a data analyst at Uber,
20 did you have any other positions?

21 A. Yes. I was a claims analyst.

22 Q. For how long?

23 A. Maybe, a year and a half.

24 Q. And any other positions or titles at Uber
25 before that?

Todd Gaddis
May 19, 2023

Todd Gaddis
May 19, 2023

1 A. Just one more. Before that I was a claims
2 advocate for probably about a year.

3 Q. Do you have any other employment other
4 than you employment with Uber during that period of
5 time?

6 A. No.

7 Q. What do your job responsibilities include
8 over the last four years as a data manager at Uber?

9 A. Sure. So, I have a team that reports to
10 me. So, a team of data scientists that report up
11 to me. So, there's various managerial duties,
12 whether it's strategy, personal development, peer
13 reviewing their work. So, everything that goes
14 along with being a manager.

15 But I also work very closely with the
16 insurance legal team for any matters such as this
17 where data is requested.

18 Q. Okay. And when you say you supervise data
19 scientists, what is the scope of what the team of
20 data scientists do? What is the scope of their
21 job?

22 A. It's going to vary by the individual, but
23 for example: They will also be helping out with
24 these legal requests that we're discussing.

25 Q. Is the data scientist team specifically

Todd Gaddis
May 19, 2023

1 Todd Gaddis
2 May 19, 2023
3 for lawsuits or does it have a purpose that goes
4 beyond just responding to information regarding
5 lawsuits?

6 A. Like I mentioned, it's going to be
7 dependant on the individual. So, we do have a
8 portion of the team that is more focused on these
9 types of requests or maybe certain types of
10 regulatory requests for example.

11 Q. In terms of supervision, how many data
12 scientists do you supervisor currently?

13 A. I currently have three direct reports.

14 Q. And in terms of -- you said you have
15 responsibilities relating to insurance and the
16 legal team and assisting with that, is it just to
17 determine whether or not individuals are on app,
18 off app, things of that nature or does it go beyond
19 that also?

20 A. That's one of the types of things we're
21 often involved in, but it's going to depend on the
22 specific request. There could be specific
23 discoveries, for example, that we need to help pull
24 data for.

25 Q. Okay. And now let's talk about your
couple of years as a data analyst at Uber. What
were your job responsibilities as a data analyst?

Todd Gaddis
May 19, 2023

Todd Gaddis
May 19, 2023

1 A. Sure. Again, it varied a little bit, but
2 I was actually working on the same type of thing as
3 a data analyst. So, I was working very closely
4 with the insurance legal team on these data
5 requests.

6 Q. Anything else other than working with the
7 insurance legal team as a data analyst that you
8 did?

9 A. You know, it was over four years ago.
10 There's probably lots of different things that I
11 was involved in, but there could have been a
12 regulatory request that requires some data being
13 pulled for the regulatory legal team. It's just
14 going to be specific to that timeframe.

15 Q. Okay. And what was your job
16 responsibilities as a claims analyst for a couple
17 years?

18 A. Yeah. Before that, one of the things I
19 did was work very closely with our insurance claims
20 team to put together metrics monitoring dashboards.
21 Various different types of sequence based queries
22 to supporting the insurance claims team for any
23 type of data needs.

24 Q. Okay. And then what about your job
25 responsibilities as a claims advocate?

Todd Gaddis
May 19, 2023

Todd Gaddis
May 19, 2023

1 A. Sure. As a claims advocate one of the
2 things we did very often was look at these
3 application status types of requests for the
4 insurance carriers, but also worked very closely in
5 making sure there is information and communication
6 between involved parties and the insurance carrier
7 if they needed any contacts or anything like that.
8 We would be there to help connect the two parties
9 if needed.

10 Q. Now, in your work with Uber have you ever
11 been involved in the development of the Uber app.

12 A. I have not coded in the Uber application,
13 the Uber driver application, if that's what you're
14 referring to.

15 Q. I wasn't being that specific about that
16 you coded to it, but just being part of a team of
17 individuals who helps develop the operation of this
18 application.

19 So, I think coding is one part of that I
20 would assume, but I assume there's other decisions
21 to be made.

22 Were you ever part of the decision making
23 or the development of the Uber app?

24 MR. WILLIAMSON: You can say over
25 objection.

Todd Gaddis
May 19, 2023

1 Todd Gaddis
2 May 19, 2023
3 A. I'm not involved in the development of the
4 application.

5 Q. Have you or your team ever made
6 suggestions to modifications of the Uber app or/and
7 it's application?

8 MR. WILLIAMSON: Same objection.

9 A. Nothings come to mind where we're the ones
10 making the suggestion to the engineering
11 development of the app.

12 Q. All right. You had -- prior to this
13 deposition, did you review any documents to prepare
14 for this?

15 A. Yes, I did.

16 Q. Okay. What did you review?

17 A. My original affidavit. There was an
18 attachment, I believe, for the application status
19 for that affidavit. There was a police report. I
20 believe there was some data relating to agreements
21 and dates of those agreements as well as some of
22 those agreements actually printed out.

23 Q. Did you draft your affidavit?

24 A. I worked in connection with the legal team
25 or collaboration with the legal team.

26 Q. Okay.

27 A. So, I reviewed it and verified everything

Todd Gaddis
May 19, 2023

1 in there.

2 Q. So, I want to talk you to now about just
3 how the Uber app actually works, how it operates.

4 So, how does a driver apply to be an Uber
5 driver?

6 A. Well, the driver can create an account.
7 So, generally with a phone number or e-mail and
8 password.

9 After creating the account, depending on
10 the market you're in, there can be certain
11 requirements that have to be met before you're able
12 to connect with a rider -- before the app will
13 connect riders and drivers together.

14 Once an individual has all those
15 requirements met, they can then go online within
16 the application to be connected with riders.

17 Q. Okay. The app is able to be downloaded --
18 the Uber App I should say, is able to be downloaded
19 on all different platforms; iPhones, tablets, all
20 sorts of things like that, correct?

21 A. I believe the driver app currently works
22 on IOS and Android-based devices.

23 Q. Okay. And when you have -- once they've
24 created an account, they've downloaded the app to
25 be able to receive drivers, they have to turn it on

Todd Gaddis
May 19, 2023

1 Todd Gaddis
2 May 19, 2023
as available status; is that correct?

2 MR. WILLIAMSON: Object to form.

3 A. Maybe I can clarify it.

4 Q. Yes, please.

5 A. The drivers, once they meet those
6 requirements they would then have to click the
7 online button to become available to connect with a
8 rider.

9 Q. Now, if they have not clicked the online
10 button, would they -- let me do this language-wise.

11 You're saying the word "online". In your
12 affidavit you us the word "offline status" to
13 describe "not available to receive a request on the
14 driver app"; is that correct?

15 A. Correct. Offline means you are not
16 available to receive a request.

17 Q. Online on the reverse side would mean
18 you're online and available to receive a request,
19 correct?

20 A. Correct.

21 Q. Without clicking the button that says
22 "online", is there any way for the app to be
23 anything but offline? Is it always offline until
24 you get on and click the online button? No other
25 status?

Todd Gaddis
May 19, 2023

1 Todd Gaddis
2 May 19, 2023
3 A. So, you have to click "online" to become
4 available to receive a request. Once you're online
5 there is the ability for you to move into another
6 status such as "in route" or "on trip".

7 So, I just want to make that distinction,
8 but you do need to click the online button to
9 actually go online to receive any of those requests
10 and be connected with riders.

11 Q. Okay. And when they click the online,
12 based upon the records I was seeing from Uber,
13 there's some type of documentation of that
14 timeframe when the person signs on. It looked like
15 you had actual timestamps for when the driver
16 clicks that online button; is that correct?

17 A. Correct. Each -- we can call it a "status
18 change". So, for example: Moving offline to
19 online.

20 Every time there is one of those status
21 changes, that's recorded. A realtime of the actual
22 timestamp where that event is occurring or that
23 status change is actually occurred.

24 Q. Okay. And how is that data stored? How
25 is transmitted -- well, let me restart that
 actually. First let me ask the transmitter.

 How is that data transmitted to Uber?

Todd Gaddis
May 19, 2023

1 Todd Gaddis
2 May 19, 2023
3 A. Well, when you put it in your request to
4 change your status such as going online, that will
5 send the question to Uber's servers. Uber's
6 servers will check to see if you meet the
7 requirements to go online.

8 And then if you are online -- if you are
9 able to, it will record it as an online status
10 change, and connect back to the app to move you
11 into the online status.

12 Q. Okay. So, these timestamps, these are
13 automated timestamps that are -- or status change
14 stamps that the computer registers when it receives
15 the data online; is that correct?

16 A. This is when the servers identify that you
17 can be moved to the next status, and they will then
18 move the application to that status.

19 Q. And, I mean, this all happens very --
20 we're talking about -- this obviously is multitude
21 of steps, but it all happens within seconds,
22 correct?

23 A. Yes. It's very fast.

24 Q. Okay. All right.

25 Now, is there any way for a driver's app
 to register as offline when they are online? Is
 that possible under the operation of this app,

Todd Gaddis
May 19, 2023

1 A. So, again, the Uber servers will -- when
2 you put in a request to change the status, Uber
3 servers have to approve that status change.

4 So, Uber servers will move you into
5 online, and then connect with the app to move you
6 into online. So, Uber servers will always have the
7 most up-to-date status because they're the ones --
8 it's the one that making the decision on the status
9 change, and then it communicates that status change
10 to the phone.

11 Q. So, based on the data that you reviewed
12 for this case, the conclusion you made based on the
13 affidavit was the driver was not on app when the
14 accident happen, correct?

15 A. Correct. The driver was not online on the
16 application at the time as it was listed in the
17 police report.

18 Q. Okay. Now, have you read a copy of the
19 driver of the vehicle's transcript?

20 A. I have not.

21 Q. Okay. Have you received the summery of
22 the testimony that was given by the driver of the
23 vehicle?

24 A. I have not.

25 Q. Okay. Are you aware that the driver of

Todd Gaddis
May 19, 2023

1 Todd Gaddis
2 May 19, 2023
3 the vehicle said that he was, in fact, online using
4 the Uber app at the time that the accident
5 happened?

6 A. I can't speak to the -- what the driver
7 said. I wasn't there. Nor can I speak to his --
8 to his intent, but what I can say is conclusively
9 from the data, the driver was not online and
10 available to receive any ride requests.

11 Q. Got it. Okay. All right.

12 So, once the driver goes online, now what
13 happens next? So, they can receive requests from
14 -- from riders; is that correct?

15 A. So, once they move into that online status
16 they are now available to be connected with a
17 rider.

18 So, if a rider is in the area requesting a
19 ride, they may have the option or the -- they may
be connected with that rider for completing those
ride service.

20 Q. Okay. And so, it's not like the driver
21 has any choice in which riders he's picking? The
22 riders are going to pick and reach out to him or
23 her first, correct?

24 A. The rider will put in a request to be
25 connected with a driver, and then the driver has

Todd Gaddis
May 19, 2023

1 Todd Gaddis
2 May 19, 2023
the ability to accept a request if they would like
2 to connect with that rider.

3 Q. So, first the rider will accept the
4 driver, and then the driver has to accept, and then
5 the ride is accepted fully?

6 A. Yeah. I would say that the rider doesn't
7 accept the driver. The rider puts out a request
8 saying "I would like ride services", and then
9 drivers can be the ones that accept whether they
10 want to provide those ride services.

11 Q. Okay. Now, how does -- how physically
12 does a driver accept the request from a rider?

13 A. There's been different iterations over the
14 time, but in general there's an option when an
15 officer is received from a driver's perspective,
16 they have the option to accept or not accept that
17 ride.

18 Q. Okay. But how do they do that? Do they
19 have click a button; do they have to type
20 information; how do they accept the ride?

21 A. Generally, they would be clicking a
22 button.

23 Q. Is it, like -- I mean, is it like an
24 online button; is it a button that says accept or
25 what is it?

Todd Gaddis
May 19, 2023

Todd Gaddis
May 19, 2023

1 A. Like I mentioned, it's changed over time.

2 I don't remember the exact product appearance in
3 2019, but, you know, it's pretty obvious you're
4 accepting it or not accepting it.

5 Q. Got it. On all the different iterations
6 and applications on all the different devices, you
7 still have to touch something to cause it to
8 actually accept the ride, correct?

9 A. Yeah. Generally that's how it would work,
10 correct.

11 Q. Now, are there instructions to the drivers
12 given or advisories given to the drivers to not be
13 operating the motor vehicle at the time that you
14 accept the ride, have the to click the button for
15 the ride?

16 MR. WILLIAMSON: Object to form.

17 A. I don't know what type of guidance is
18 provided in those situations.

19 Q. Okay. Are there any instructions that
20 you're aware to any of the drivers to not click the
21 button while they're operating a vehicle?

22 MR. WILLIAMSON: Same objection.

23 A. I don't know.

24 Q. Does that ever come up in discussions with
25 you and the insurance and the legal team about the

Todd Gaddis
May 19, 2023

1 Todd Gaddis
2 May 19, 2023
fact that they need to click a button to accept the
3 ride?

4 MR. WILLIAMSON: Object to form and
5 object to the extent you're asking about
6 any privileged communications with the
7 legal team.

8 Q. I'm going to retract the part about the
9 legal team. We don't want you to talk about
10 confidential information with your lawyers to the
11 extent there's been any conversations not with the
12 lawyers, but with the insurance team or development
13 team regarding the actual driver needing to click a
button to accept the ride?

14 A. I'm not involved in that type of process
15 or decision making.

16 Q. Who is?

17 A. I imagine many people but it's -- I don't
18 know.

19 Q. Well, is there -- are there people at Uber
20 that are responsible for making sure the Uber app
21 is safe?

22 MR. WILLIAMSON: Object to form.

23 A. There's lots of people within the company
24 that work on lots of different portions of the
25 application.

Todd Gaddis
May 19, 2023

1 Todd Gaddis
2 May 19, 2023
3 Q. Okay. My question was a little more
4 specific than that. It was just: Is there anyone
5 at Uber that you're aware of that's responsible for
6 making sure that Uber app is safe for the users?

7 MR. WILLIAMSON: Same objection and
8 object to the extent it's outside the
9 limited scope of the deposition as ordered
10 by the court.

11 You can answer, Todd.

12 A. Like I, mentioned you know, I'm not
13 involved in the decision making of the development
14 of the app. So, I can't speak to what thought
15 processes or decisions are being made when these
16 decisions or these product developments are being
17 made.

18 Q. Okay. That was wasn't my question. I'm
19 asking you if you are aware of anyone that is. I
20 know that you're not and you're privy to that.

21 I'm asking if there's a department or a
22 person that concerns themselves with that?

23 MR. WILLIAMSON: Same objections.

24 A. Well, safety is very important at the
25 company, but I can't speak for individuals.

26 Q. Okay. I'm not asking you to speak for
27 individuals, Mr. Gaddis.

Todd Gaddis
May 19, 2023

1 Todd Gaddis
2 May 19, 2023
3 I'm asking you if there is a person or a
4 department or a number of people, a team of people,
5 that are responsible for looking at the safety
6 elements of the Uber app?

7 That's just yes or no or I don't know.
8 That's not -- I'm not looking for you to look into
9 the heads of anyone.

10 A. There's people --

11 MR. WILLIAMSON: Sorry Todd.

12 10 Same objections.

13 11 A. Sorry. There are people, you know, who
14 are looking at safety. That's the extent that I
15 can answer to that.

16 Q. Do you know who those people are?

17 A. There could be different people. Again,
18 it's going to be very situational. So, I don't --
19 I don't have a name to give to you.

20 Q. Do you know any of the names of people
21 that deal with the safety of the Uber app?

22 A. You can go with my manager. He's involved
23 in the safety of the app, I guess you can say.

24 Q. Okay. Who's your manager?

25 A. Sunny Wong.

Q. Okay. First name S-O-N-N-I or Y?

A. With a Y.

Todd Gaddis
May 19, 2023

Todd Gaddis
May 19, 2023

1 Q. And last name you said, Wong?

2 A. Yeah. W-O-N-G.

3 Q. Got it. And what is Ms. Wong's title?

4 A. It's Mr., and he is an applied scientist
5 manager.

6 Q. Okay. And after the driver selects the
7 accept or decline button or let's say they hit the
8 accept button, now they're going to have to pick up
9 the rider, correct, that's the next step?

10 A. Correct. After they accept a ride request
11 they will then move into the, we call it the
12 in-route stage, where they're in route to pick up
13 the rider.

14 Q. Okay. And now, in route how does the
15 driver determine where they need to go for the
16 pickup?

17 A. So, they'll receive a pickup location that
18 they can navigate to to locate that rider.

19 Q. Are they supposed to use the Uber app's
20 mapping features to reach the location?

21 MR. WILLIAMSON: Object to form.

22 A. The driver has the option to use the
23 navigation built in or they can use their own
24 personal navigation.

25 Q. Is there -- is there any policy of Uber

Todd Gaddis
May 19, 2023

1 Todd Gaddis
2 May 19, 2023
that Uber would like the drivers to use the
navigation for safety purposes?

3 MR. WILLIAMSON: Form.

4 A. I'm not aware of any policies relating to
5 that.

6 Q. Is there -- if they're using their own
7 navigation, is it still transmitting data back to
8 Uber that they're still in route or on trip or
9 something?

10 A. Them using their own navigation does not
11 change the application status of in route.

12 Q. Right. Now, to use the navigation option
13 for Uber, do they have to select another button?
14 They have to press another button to accept that
15 navigation or to opt out of it to use their own
16 navigation.

17 A. I'm not familiar with the specific product
18 experience in 2019. I don't know off the top of my
19 head.

20 Q. Are you familiar at all with any of the
21 laws in New York State regarding operating a
22 vehicle while using an electronic device, a
23 portable electronic device?

24 A. I am not.

25 Q. Okay. Are you familiar in any of the

Todd Gaddis
May 19, 2023

1 Todd Gaddis
2 May 19, 2023
3 states whether or not there's any prohibitions
4 against using a portable electronic device as
5 you're operating a motor vehicle?

6 MR. WILLIAMSON: Form and scope of
7 the deposition.

8 A. Yeah, I don't know.

9 Q. Are there any other options for the driver
10 to be able to operate the vehicle -- excuse me --
11 to be able to operate the application without
12 touching the screen and looking at the screen?

13 A. I don't know.

14 Q. There's no audio ways to select these
15 choices of accepting or not accepting and the
16 mapping on the app, correct?

17 A. I don't know the experience in 2019.

18 Q. Have you ever heard of an audio option
19 that allows you to not use your hands to select
20 these options?

21 A. I may have, but honestly I don't know.
22 So, I don't want to speculate.

23 Q. Who would know that?

24 A. I don't know.

25 Q. Are you familiar with Uber's business
practices in general?

MR. WILLIAMSON: Object to form.

Todd Gaddis
May 19, 2023

1 Todd Gaddis
2 May 19, 2023
3 A. Generally, it's very vague, but I can say
4 in general, sure.

5 Q. To retrieve the data that you retrieved
6 for the purpose of your affidavit that shows the --
7 the particular phase -- changes when it went on
8 trip and offline, how do you actually produce that
9 document? Do you have to go in and extract the
10 data or is this a report that you run and it does
11 it automatically or something else?

12 A. Sure. So, we have a database that I can
13 use a query to access the information from the
14 database and then proved that information in a, I
15 believe, it was a PDF document.

16 Q. Okay. And a PDF document, that's actually
17 created by you, that's not generated automatically
18 by the query, is it?

19 A. So, no. He have to have a means to
20 provide that information to you.

21 Q. Right.

22 A. So, you can think of it as raw text, but
23 we need to provide the text to you somehow, so that
24 has to be saved in some type of document. But I
25 can confirm everything in that PDF is what we would
 see in the actual whole.

26 Q. Go it, right. Let's just finish out the

Todd Gaddis
May 19, 2023

1 Todd Gaddis
2 May 19, 2023
1 technological operation of the app with the
2 drivers.

3 So, what we're talking about before is
4 they pick up a driver, they're now out on route --
5 on trip.

6 Now, when they drop off the rider, what's
7 the next step? What do they do then?

8 A. So, after they complete a trip they would
9 then move into the available trip status which
10 would, again, allow them to then be available to
11 receive a ride request similar as to when they
12 logged in online.

13 Q. When they conclude the ride, do they then
14 have to press another button to conclude the ride
15 or does it conclude automatically when they reach
16 the destination?

17 A. I believe that they will end the trip by
18 clicking a button.

19 Q. Okay. And then after they click that
20 button that ends the ride, they click another
21 button that puts themselves back on open and
22 available, or they automatically go back to open
23 and available?

24 A. So, after they end that trip they will
25 automatically be pushed back in to available.

Todd Gaddis
May 19, 2023

Todd Gaddis
May 19, 2023

1 Q. Got it.

2 MR. GAMMONS: I'm just going to look
3 through my notes, but I don't think I got
4 a lot left. There may be nothing. So,
5 give me one second.

6 MR. WILLIAMSON: Take your time.

7 Q. Oh, I missed one step. I'm sorry.

8 So, the driver takes on a rider and is on
9 route to go pick up the rider, with they actually
10 get to the rider, before it changes to "on trip" do
11 they again have to click another button to say,
12 hey, we got the rider in the car now, or is that
13 something automatic?

14 (page break for jurat)

15

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Todd Gaddis
May 19, 2023

1 Todd Gaddis
2 May 19, 2023
3 A. Yeah. I believe once the rider would
4 enter into the car, the driver would click the
5 "begin trip" button to actually start the on-trip
6 status change.

7 Q. Got it. Okay.

8 MR. GAMMONS: All right, guys. That
9 was quick. We're all done.

10 (TIME NOTED: 12:42 p.m.)

11 I, TODD GADDIS, the witness herein, having read the
12 foregoing testimony of the pages of this deposition, do
13 hereby certify it to be a true and correct transcript,
14 subject to the corrections, if any, shown on the attached
15 page.

16 _____
17 TODD GADDIS

18
19 SUBSCRIBED AND SWORN TO BEFORE ME
20 THIS ____ DAY OF _____, 20 ____.

21
22
23 _____
24 NOTARY PUBLIC
25

Todd Gaddis
May 19, 2023

1 STATE OF NEW YORK
2 COUNTY OF NASSAU

Todd Gaddis
May 19, 2023

)
)
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3

4 I, ANTHONY R. DEPALMA, a Certified Shorthand
5 Reporter, do hereby certify:

6 That prior to being examined, the witness in
7 the foregoing proceedings was by me duly sworn to testify
8 to the truth, the whole truth, and nothing but the truth;
9 That said proceedings were taken before me at the time
10 and place therein set forth and were taken down by me in
11 shorthand and thereafter transcribed into typewriting
12 under my direction and supervision;

13 I further certify that I am neither counsel
14 for, nor related to, any party to said proceedings, not
15 in anywise interested in the outcome thereof.

16 In Witness Whereof, I have hereunto set by
17 this 4th day of June, 2023.

18

19

Anthony R. DePalma

20 ANTHONY R. DEPALMA

21

22

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25

Todd Gaddis
May 19, 2023

Todd Gaddis
May 19, 2023

1 DEPOSITION ERRATA SHEET

2 Page No. _____ Line No. _____

3 Change: _____

4 Reason for change: _____

5 Page No. _____ Line No. _____

6 Change: _____

7 Reason for change: _____

8 Page No. _____ Line No. _____

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17 Page No. _____ Line No. _____

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19 Reason for change: _____

20 Page No. _____ Line No. _____

21 Change: _____

22 Reason for change: _____

25 TODD GADDIS

DATED

Todd Gaddis
May 19, 2023

Todd Gaddis
May 19, 2023

	I N D E X O F W I T N E S S E S	PAGE
	EXAMINATION BY	
1		
2	MR. GAMMONS	7
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

Todd Gaddis
May 19, 2023

	access 29:11	anyone 24:2,17 25:7	audio 8:1 28:12,16
1	accident 19:14 20:2	app 11:15,16	automated 18:11
1725 7:18	accommodate 8:22	13:11,23	automatically 29:9,15
2	account 15:6,9,24	14:4,9 15:3, 12,17,18,21, 24 16:14,22	30:15,22,25
20 9:3	actual 17:13,19	18:8,23,25	available 16:1,7,13, 16,18 17:2
20-plus 9:4	23:12 29:24	19:5,13 20:2	20:8,14
2019 22:3 27:18 28:15	address 7:14,15,16	23:20 24:4, 12 25:4,19, 21 28:14	30:9,10,22, 23,25
3	advisories 22:12	30:1	aware 19:25 22:20
3rd 7:18	advocate 10:2 12:25	app's 26:19	24:3,17 27:4
9	13:1	appearance 22:2	
94158 7:19	affidavit 14:15,17,21 16:12 19:13 29:4	application 13:3,12,13, 18 14:2,5,16 15:16 18:16 19:16 23:25 27:11 28:9	B
A	afternoon 7:20	applications 22:6	back 8:5,8 18:8
ability 17:3 21:1	ago 12:9	applied 26:4	27:7 30:21, 22,25
able 15:11,17,18, 25 18:7 28:8,9	agreements 14:18,19,20	apply 15:4	based 12:21 17:10 19:11,12
accept 21:1,3,4,7, 9,12,16,20, 24 22:8,14 23:1,13 26:7,8,10 27:14	allow 30:10	approve 19:3	behalf 9:5
accepted 21:5	allows 28:17	area 20:16	believe 14:16,18 15:21 29:13 30:17
accepting 22:4 28:13	amount 9:3	around 9:11	bit 12:1
	analyst 9:14,15,19, 21 11:24,25 12:3,7,16	asking 7:23 23:4 24:17,19,24	break 8:21
	Android-based 15:22	25:1	built 26:23
	answer 8:3,16 24:9 25:13	assisting 11:14	business 7:15,16 28:23
	answering 8:9	assume 13:20	button 16:7,10,21, 24 17:6,14
	anthony 7:7	attachment 14:16	21:19,22,24 22:14,21 23:1,13

Todd Gaddis
May 19, 2023

<p>26:7,8 27:13,14 30:14,18,20, 21</p> <hr/> <p>C</p> <p>California 7:18</p> <p>call 17:15 26:11</p> <p>carrier 13:6</p> <p>carriers 13:4</p> <p>case 19:12</p> <p>certain 11:7 15:10</p> <p>change 17:16,21 18:2,8,11 19:2,3,9 27:11</p> <p>changed 22:1</p> <p>changes 17:19 29:5</p> <p>check 18:4</p> <p>choice 20:21</p> <p>choices 28:13</p> <p>claims 9:21 10:1 12:16,19,22, 25 13:1</p> <p>clarify 16:3</p> <p>click 16:6,24 17:1,6,9 21:19 22:14, 20 23:1,12 30:19,20</p>	<p>clicked 16:9</p> <p>clicking 16:21 21:21 30:18</p> <p>clicks 17:14</p> <p>closely 10:15 12:3, 19 13:4</p> <p>coded 13:12,16</p> <p>coding 13:19</p> <p>collaboration 14:23</p> <p>come 14:7 22:24</p> <p>communicates 19:9</p> <p>communication 13:5</p> <p>communication s 23:5</p> <p>company 23:23 24:23</p> <p>complete 30:8</p> <p>completing 20:18</p> <p>complying 7:2</p> <p>comprehensibl e 8:14</p> <p>computer 18:12</p> <p>concerns 24:20</p> <p>conclude 30:13,14,15</p> <p>conclusion 19:12</p> <p>conclusively 20:6</p>	<p>confidential 23:9</p> <p>confirm 29:23</p> <p>connect 13:8 15:12, 13 16:7 18:8 19:5 21:2</p> <p>connected 15:16 17:8 20:14,18,25</p> <p>connection 14:22</p> <p>contacts 13:7</p> <p>conversations 23:10</p> <p>copy 19:18</p> <p>correct 15:20 16:1, 14,15,19,20</p> <p>couple 11:24 12:16</p> <p>course 7:24</p> <p>court 7:3 8:5 24:8</p> <p>create 15:6</p> <p>created 15:24 29:15</p> <p>creating 15:9</p> <p>current 9:7</p>	<p>D</p> <p>dashboards 12:20</p> <p>data 9:8,9,14,15, 19 10:8,10, 17,18,20,25 11:9,22,24, 25 12:3,4,7, 12,23 14:18 17:22,25 18:13 19:11 20:7 27:7 29:3,8</p> <p>database 29:10,12</p> <p>dates 14:19</p> <p>deal 25:19</p> <p>decision 13:22 19:8 23:15 24:11</p> <p>decisions 13:20 24:13, 14</p> <p>decline 26:7</p> <p>Depalma 7:7</p> <p>department 24:19 25:2</p> <p>depend 11:19</p> <p>dependant 11:5</p> <p>depending 15:9</p> <p>deposed 8:25 9:2</p> <p>deposition 7:24 14:11 24:7 28:5</p> <p>depositions 9:5</p>
--	--	---	---

Todd Gaddis
May 19, 2023

describe	draft	exact	four
16:13	14:21	9:3 22:2	9:11 10:8
destination	driver	EXAMINATION	12:9
30:16	13:13 15:4, 5,6,21 16:14	7:9	Francisco
determine	17:13 19:13, 15,19,22,25	examined	7:18
11:15 26:15	20:4,7,10, 20,25 21:4, 7,12 23:12	excuse	fully
develop	26:6,15,22	28:8	21:5
13:17	28:7 30:4	experience	
development	driver's	27:18 28:15	G
10:12 13:11, 23 14:1,9	18:23 21:15	explain	G-A-D-D-I-S
23:11 24:11	drivers	8:19	7:13
developments	15:13,25	extent	Gaddis
24:14	16:5 21:9	23:4,10 24:6	7:13,20
device	22:11,12,20	25:12	24:25
27:22,23	27:1 30:2	extract	Gammons
28:2	drop	29:7	7:10,21
devices	30:6		general
15:22 22:6	duly		21:14 28:24
different	7:6		29:2
8:19 12:10, 21 15:19	duties	fact	generally
21:13 22:5,6	10:11	20:1 23:1	15:7 21:21
23:24 25:15		familiar	22:9 29:1
difficulties		27:17,20,25	generated
8:2		28:23	29:15
difficulty		fast	give
8:6		18:21	25:17
direct	e-mail	features	given
11:11	15:7	26:20	19:22 22:12
discoveries	either	fine	goes
11:21	8:2	7:15,17	10:13 11:1
discussing	electronic	finish	20:10
10:24	27:22,23	29:25	going
discussions	28:2	first	7:23 10:22
22:24	elements	7:6 17:24	11:4,19
distinction	25:4	20:23 21:3	12:14 18:2
17:5	employment	25:24	20:22 23:7
document	10:3,4	focused	25:16 26:8
29:7,13,14, 22	end	11:6	good
documentation	30:17,24	follows	7:20 8:24
17:11	ends	7:8	guess
documents	30:20	form	25:21
14:11	engineering	16:2 22:16	guidance
downloaded	14:8	23:3,22	22:17
15:17,18,24	event	26:21 27:3	
	17:20	28:4,25	

Todd Gaddis
May 19, 2023

H half 9:17, 23 half/two 9:18 hands 28:17 happen 8:2 19:14 happened 20:3 head 27:19 heads 25:7 hear 8:17 heard 8:4 28:16 hearing 8:6 help 11:21 13:8 helping 10:23 helps 13:17 hit 26:7 honestly 28:19 I identify 18:14 imagine 23:17 important 24:22 in-route 26:12 include 10:7	individual 10:22 11:5 15:14 individuals 11:15 13:17 24:23, 25 information 11:2 13:5 21:20 23:9 29:11, 12, 18 instructions 22:11, 19 insurance 10:16 11:13 12:4, 7, 19, 22 13:4, 6 22:25 23:11 intent 20:6 involved 11:19 12:11 13:6, 11 14:1 23:14 24:11 25:20 iOS 15:22 iphones 15:19 iterations 21:13 22:5 J job 10:7, 21 11:25 12:15, 24	28:6, 11, 15, 19, 21, 22 L language-wise 16:10 laws 27:21 lawsuits 11:1, 3 lawyers 23:9, 11 legal 10:16, 24 11:14 12:4, 7, 13 14:22, 23 22:25 23:6, 8 limited 24:7 listed 19:16 little 12:1 24:1 locate 26:18 location 26:17, 20 logged 30:12 long 9:9, 15, 22 look 13:2 25:6 looked 17:12 looking 25:3, 6, 12 28:10 lots 12:10 23:23, 24	M made 13:21 14:3 19:12 24:13, 15 make 8:4, 7 17:5 making 13:5, 22 14:8 19:8 23:15, 20 24:4, 11 manager 9:8, 9 10:8, 14 25:20, 22 26:5 managerial 10:11 mapping 26:20 28:14 market 15:10 matter 7:22 matters 10:16 Matthew 7:21 mean 16:17 18:17 21:23 means 16:15 29:17 meet 16:5 18:4 mentioned 11:4 22:1 24:10 met 15:11, 15 metrics 12:20 mind 14:7 modifications 14:4
--	---	--	---

Todd Gaddis
May 19, 2023

monitoring 12:20		once 15:14,23 16:5 17:2 20:10,13	original 14:15
motor 22:13 28:3	o	one 10:1 11:18 12:18 13:1, 19 17:18 19:8	outside 24:6
move 17:3 18:8,16 19:4,5 20:13 26:11 30:9	object 16:2 22:16 23:3,4,22 24:6 26:21 28:25	ones 14:7 19:7 21:9	P
moved 18:15	objection 13:25 14:6	online 15:15 16:7, 9,11,17,18, 22,24 17:1, 2,6,7,9,14, 17 18:2,5,6, 7,9,13,24	part 13:16,19,22 23:7
Moving 17:16	objections 22:22 24:5	open 19:5,6,15 20:1,7,10,13 21:24 30:12	particular 29:5
multitude 18:18	obvious 22:3	operate 28:8,9	parties 13:6,8
N		operates 15:3	password 15:8
name 7:11,20 25:17,24 26:1	occasionally 8:1	operating 22:13,21 27:21 28:3	PDF 29:13,14,23
names 25:18	occurred 17:21	operation 13:17 18:25 30:1	peer 10:12
nature 11:16	occurring 17:20	opt 27:15	people 23:17,19,23 25:2,8,11, 14,15,18
navigate 26:18	officer 21:15	option 20:17 21:14, 16 26:22 27:12 28:16	period 10:4
navigation 26:23,24 27:2,7,10, 12,15,16	offline 16:12,15,23 17:16 18:24 29:6	options 28:7,18	person 17:12 24:20 25:1
need 8:21 11:21 17:6 23:1 26:15 29:21	okay 8:10,11,12, 19,20,21,23 9:4 10:18 11:23 12:15, 24 14:14,24	or/and 14:4	personal 10:12 26:24
needed 13:7,9	15:17,23 17:9,22 18:10,22 19:18,21,25	ordered 24:7	perspective 21:15
needing 23:12	20:9,20 21:11,18 22:19 24:1, 16,24 25:22, 24 26:6,14		phase 29:5
needs 12:23	27:25 29:14 30:19		phone 15:7 19:10
Notary 7:6			physically 21:11
Nothings 14:7			pick 20:22 26:8, 12 30:4
number 15:7 25:2			picking 20:21
			pickup 26:16,17

Todd Gaddis
May 19, 2023

plaintiff	12:10	24:1,16	27:4
7:21	process	questions	remember
platform	23:14	7:23	22:2
7:25	processes		rephrase
platforms	24:13		8:18
15:19	produce	R	report
please	29:6	raw	10:10 14:17
7:11,14 8:3, 5,18 16:4	product	29:20	19:17 29:8
police	22:2 24:14	reach	reporter
14:17 19:17	27:17	20:22 26:20	7:3 8:5
policies	prohibitions	30:15	reports
27:4	28:1	read	10:9 11:11
policy	proved	8:5,8 19:18	represent
26:25	29:12	realtime	7:21
portable	provide	17:19	request
27:23 28:2	21:10 29:18, 21	reason	11:20 12:12
portion	provided	8:7,15	16:13,16,18
11:6	22:18	receive	17:2 18:1
portions	Public	15:25 16:13, 16,18 17:2,7	19:2 20:24
23:24	7:6	20:8,11	21:1,7,12
position	pull	26:17 30:11	26:10 30:11
9:13	11:21	received	requested
positions	pulled	19:21 21:15	10:17
9:20,24	12:13	receives	requesting
possible	purpose	18:12	20:16
18:25	11:1 29:4	record	requests
practices	purposes	7:12,14 18:7	10:24 11:7,8
28:24	27:2	recorded	12:5 13:3
prepare	pushed	17:19	17:7 20:8,11
14:11	30:25	records	requirements
press	put	17:10	15:11,15
27:14 30:14	12:20 18:1	referring	16:6 18:5
pretty	19:2 20:24	13:14	requires
22:3	puts	regarding	12:12
printed	21:7 30:21	11:2 23:12	responding
14:20		27:21	11:2
prior	Q	register	responsibile
9:12,19		18:24	25:3
14:10	queries	registers	responsibilit
privileged	12:21	18:12	ies
23:5	query	regulatory	10:7 11:13,
privy	29:11,16	11:8 12:12, 13	25 12:16,25
24:18	question	relating	responsible
probably	8:3,8,9,13, 16,19 18:3	11:13 14:18	23:20 24:3
9:11 10:2			restart
			17:23

Todd Gaddis
May 19, 2023

retract	safe	services	20:13 27:11
23:7	23:21 24:4	21:8,10	30:9
retrieve	safety	shows	step
29:3	24:22 25:3,	29:4	26:9 30:7
retrieved	12,19,21	side	steps
29:3	27:2	16:17	18:19
reverse	San	signs	stored
16:17	7:18	17:12	17:22
review	saved	similar	strategy
14:11,14	29:22	30:11	10:12
reviewed	saying	situational	Street
14:25 19:11	16:11 21:8	25:16	7:18
reviewing	says	situations	suggestion
10:13	16:21 21:24	22:18	14:8
ride	science	sorts	suggestions
20:8,17,19	9:8	15:20	14:4
21:5,8,10,	scientist	Sounds	summery
17,20 22:8,	10:25 26:4	8:24	19:21
14,15 23:2,	scientists	speak	Sunny
13 26:10	10:10,19,20	20:4,5	25:23
30:11,13,14,	11:10	24:12,23,24	supervise
20	scope	specific	10:18
rider	10:19,20	11:20 12:14	supervision
15:12 16:8	24:7 28:4	13:15 24:2	11:9
20:15,16,18,	screen	27:17	supervisor
24 21:2,3,6,	28:10	specifically	11:10
7,12 26:9,	seconds	10:25	supporting
13,18 30:6	18:19	speculate	12:22
riders	see	28:20	supposed
15:13,16	18:4 29:24	spell	26:19
17:8 20:12,	seeing	7:11	sure
21,22	17:10	stage	8:4,8,10 9:3
right	select	26:12	10:9 12:1
14:10 18:22	27:13 28:12,	stamps	13:1,5 23:20
20:9 27:12	17	18:12	24:4 29:2,10
29:19,25	selects	state	swear
route	26:6	7:7,11,14	7:3
17:4 26:12,	send	27:21	sworn
14 27:8,11	18:3	states	7:6
30:4	sequence	28:1	
run	12:21	status	T
29:8	servers	13:3 14:16	
<hr/>	18:3,4,14	16:1,12,25	T-O-D-D
S	19:1,3,4,6	17:4,15,18,	7:13
S-O-N-N-I	service	21 18:2,7,9,	tablets
25:24	20:19	11,15,16	15:19
		19:2,3,7,8,9	

Todd Gaddis
May 19, 2023

take	timestamp		virtual
8:21	17:20	U	7:25
talk	timestamps	Uber	visual
11:23 15:2	17:13 18:10,	9:5, 7, 10, 13,	8:2
23:8	11	16, 19, 24	
talking	title	10:4, 8 11:24	
18:18 30:3	9:7 26:3	13:10, 11, 12,	W
team	titles	13, 23 14:4	W-O-N-G
10:9, 10, 16,	9:24	15:3, 4, 18	26:2
19, 25 11:6,	today	17:10, 25	want
14 12:4, 7,	7:24	19:1, 2, 4, 6	8:9, 16 15:2
13, 20, 22	Todd	20:2 23:19,	17:5 21:10
13:16 14:3,	7:13 24:9	20 24:3, 4	23:8 28:20
22, 23 22:25	25:9	25:4, 19	way
23:6, 8, 11, 12	top	26:19, 25	16:22 18:23
25:2	27:18	27:1, 8, 13	ways
technological	touch	Uber's	28:12
30:1	22:7	18:3 28:23	went
terms	touching	understand	29:5
11:9, 12	28:10	8:13, 15, 17	WILLIAMSON
testified	transcript	up-to-date	7:16 13:24
7:8	19:19	19:7	14:6 16:2
testimony	transmitted	users	22:16, 22
19:22	17:23, 25	24:4	23:3, 22
text	transmitter		24:5, 21 25:9
29:20, 21	17:24	V	26:21 27:3
thing	transmitting	vague	28:4, 25
8:4, 12 12:2	27:7	29:1	witness
things	trip	varied	7:2
11:16, 18	17:4 27:8	12:1	Wong
12:10, 18	29:6 30:5, 8,	various	25:23 26:1
13:2 15:20	9, 17, 24	10:11 12:21	Wong's
think	turn	vary	26:3
13:19 29:20	15:25	10:22	word
thought	two	vehicle	16:11, 12
24:12	13:8	19:23 20:1	work
three	type	22:13, 21	10:13, 15
11:11	12:2, 23	27:22 28:3, 8	12:19 13:10
time	17:11 21:19	vehicle's	22:9 23:24
8:22 10:5	22:17 23:14	19:19	worked
17:18 19:16	29:22	verification	13:4 14:22
20:2 21:14	types	7:1	working
22:1, 13	11:7, 18	verified	12:2, 3, 6
timeframe	12:21 13:3	14:25	works
12:14 17:12			15:3, 21
times			
9:2			

Todd Gaddis
May 19, 2023

Y

Yeah
12:18 21:6
22:9 26:2
28:6
year
9:17,23 10:2
years
9:11,18 10:8
11:24 12:9,
17
York
7:7 27:21